

Exhibit L

McCue, Thomas A. 754-2579

From: Kori Rianda Lukasko [kori@rianda.com]
Sent: Thursday, December 28, 2006 11:50 AM
To: McCue, Thomas A. 754-2579
Subject: RE: Greenfield SOI

Dear Tom,

Following are comments on the above referenced proposal to LAFCO.

I believe that the sphere of influence is about what we feel is appropriate, however, the future planning areas on the South side of town are a concern.

As you know, I am in favor of directing a rather narrow band of development to the foothills. The ground to the east which is the preferable direction takes out some excellent farmland, therefore, I would suggest that the future planning area go to the west, toward the Arroyo Seco, which is very good vineyard land. As you know, the Conservancy would like to see the linear, high density, "smart growth principles" development along the edges of the valley, keeping as much of the valley open for production as possible.

Notwithstanding any of the above, we feel that the annexation is excessively large and we would also like very much to see any prime farmland developed within the sphere to be mitigated on a 3 to 1 basis. 3 acres of like kind property should be conserved for each acre taken.

Attached is a letter that we sent to the Monterey County Planning Commission that outlines the conservancy's position on agricultural mitigation.

Please call if you have any questions or comments.

Brian Rianda, MCAHLC Managing Director

12/28/2006

MONTEREY COUNTY AGRICULTURAL AND HISTORICAL LAND CONSERVANCY

P.O. Box 1731, Salinas CA 93902

22 August 2006

Cosme Padilla, Chair
Monterey County Planning Commission
240 Church Street
Salinas, California 93901

RE: *Consideration for Agricultural Conservation in the GPU4*

Dear Chairman Padilla and Commissioners,

The Monterey County Agricultural & Historical Conservancy, Inc. has existed in Monterey County for the past twenty-five years to protect and preserve the county's most valuable agricultural lands. In the County's 1982 General Plan, agricultural protection was addressed in many ways (e.g. Goal #30). The 1982 General Plan policy 30.0.5 directed the County's support for tax and economic incentives with the intent for such a policy to lead to long-term preservation.

It is our position Monterey County General Plan GPU4 does not address long-term agricultural preservation adequately enough. The closest GPU4 comes to such preservation is policy AG-1.5:

"AG-1.5 Policies that provide tax and economic incentives to enhance the competitive capabilities of farms and ranches, thereby insuring long-term conservation, enhancement, and expansion of viable agricultural lands shall be supported. Examples of these policies and programs include but are not limited to:

- a. Establishment of a program to purchase and lease back agricultural lands near urban or developing areas for continued agricultural use.*
- b. Payment of fees as mitigation for the loss of farmland to other uses.*
- c. Voluntary restrictions to agricultural uses through contributions of onsite or off-site conservation easements or other appropriate techniques.*
- d. Williamson Act Contracts*

*e. Transfer of development rights.
(Root: GP policy 30.0.5)''*

GPU4 needs direction more than is proposed in AG-1.5. We ask that your commission consider the importance of agricultural conservation and the need to give specific direction (in the form of land replacement mitigation). To that end, mitigation for the loss of agricultural land should be required on the following ratios:

1. Loss of agricultural lands of national importance – 3:1
2. Loss of agricultural lands of Statewide importance – 2.5:1
3. Local and Unique farmlands – 1:1

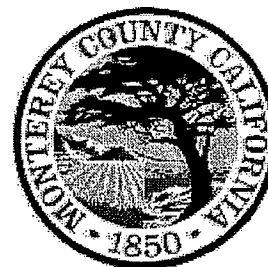
The determination of the importance should use the Natural Resource Conservation Service criteria to determine the importance of the ag land in question. These criteria are not, in our estimation, foreboding or restrictive on development, but do offer a reasonable resolution to the desire for development versus the need to conserve the viability of the County's agricultural lands. We are happy to discuss these issues with you and the full commission and look forward to favorable consideration of our request.

Sincerely,

Brian Rianda, Managing Director
MCAHLC, Inc.

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY



PLANNING DEPARTMENT, Mike Novo, Interim Director

168 W. Alisal St., 2nd Floor
Salinas, CA 93901

(831) 755-5025
FAX (831) 757-9516

December 8, 2006

Anna Vega, City Manager
City of Greenfield
P.O. Box 127/45 El Camino Real
Greenfield, CA 93927

Subject: City of Greenfield Sphere of Influence Update (PD060819)

Dear Ms. Vega:

Thank you for your letter dated October 31, 2006 responding to our comments regarding the City's proposed SOI boundary. In general, the City's responses do not provide adequate assurance that the County's standards will be met in the SOI areas. The County needs assurances from the City that, as development occurs, the City imposes on these developments conditions that address impacts to County facilities and needs for improvements in the area, and that the County will have opportunities to review and comment on projects and improvements that affect County facilities. Below are our detailed responses to the comments contained in your letter.

General Comments

The City's letter states: *"The City completed its public review obligations on the proposed SOI boundary, and prepared and approved its General Plan in accordance with State law."* The County understands that the City adopted its General Plan Update and certified the corresponding EIR in May 2005. Accordingly, the County's initial comments regarding the SOI proposal were submitted by the Board of Supervisors on November 8, 2005 (since the County's land use departments/agency apparently did not submit comments on the General Plan or EIR). The City's response does not explain how the County's comments on the City's Preliminary Sphere of Influence evaluation were subsequently addressed by the City prior to submitting the current request. It is unclear how the City has completed its public review obligations on the proposed SOI boundaries. Isn't this the purpose of the current negotiations between the City and the County?

Agricultural Buffers (Agricultural Commissioner and Planning Department)

Buffering Policies. The City's letter states: *"the Artisan Agriculture/Visitor Serving (AAVS) designation is an extremely low-intensity use that is compatible with agriculture and serves as an agricultural transition area to the north ... "... and has effectively used the AAVS designation and strong policies to provide adequate buffers city wide."*

The City's response does not provide adequate assurance that the County's standards for agricultural uses (Section 21.66.030) will be met in the SOI areas. In particular, it is unclear whether single-family residential is a permitted use in the AAVS designation. If so, what provisions are included in the AAVS district to meet the requirements of Section 21.66.030, including the requirement for a well-defined buffer zone? In addition, the City's response does not identify specific General Plan policies that "*provide adequate buffers city wide.*" This discussion should provide specifics regarding how adequate ag buffers will be provided in each area proposed to be included in the SOI. In particular, what ag buffers are proposed on the west side of the City?

Planning Department

Financial Loss to the County. The City's response concludes that there is no further need to quantify fiscal changes. The City's responses to the County's comments applies only to the overall General Plan rather than to the specific issues that are raised by the proposed SOI expansion. In particular, how will the loss of important farmland be mitigated. Policy AG-1.12 in the draft Monterey County General Plan Update states:

"The County shall prepare, adopt and implement a program that requires projects involving a change of land use designation resulting in the loss of Important Farmland (as mapped by the California Department of Conservation Farmland Mapping and Monitoring Program) to mitigate the loss of that acreage. The program may include rations, payment of fees, or some other mechanism. Until such time as the program has been established, projects shall mitigate the loss of Important Farmland on an individual basis as feasible as determined by the Agricultural Commissioner. A Community Plan or Rural Center Plan that includes a mitigation program shall not be subject to this policy."

Phasing. The phasing of development in the areas proposed to be included in the SOI expansion needs to be addressed. In particular, how will adequate ag buffers be provided as the areas are developed? How will infrastructure and services be extended in a logical manner?

Public Works Department

The City acknowledges that coordination with the County is necessary, and that more detailed review will be required as specific development projects are proposed. Public Works' main concerns are with our roadway facilities, and that any impacts to our facilities are addressed. We need assurances from the City of Greenfield that, as development occurs in Greenfield, the City imposes on these developments conditions that address impacts to our facilities and our needs for road improvements in the area, and that we have opportunities to review and comment on projects and improvements that affect County facilities. We would also like to encourage the City to utilize the TAMC fee as a means to address cumulative impacts to the regional roadway system. In their response, it was unclear whether or not they would utilize this fee program.

Anna Vega
December 8, 2006
Page 3

Health Department

The Health Department has no additional comments at this time.

Water Resources Agency

MCWRA agrees with the Monterey County Health Department that when the wastewater treatment facility is expanded it should be upgraded to a tertiary treated wastewater facility. Such an upgrade would accomplish two things

1. When the Salinas River floods and overtops the holding ponds, they would contain only tertiary treated wastewater.
2. The tertiary wastewater could be used to provide irrigation water for any large landscaped areas such as median strips, parks, golf courses, etc. and nearby agricultural lands thus reducing ground water pumping in the area.

The build-out of the proposed Sphere of Influence would dramatically increase the impervious surface in the area thereby increasing stormwater runoff. As each development proposal comes forward, a drainage plan should be required that addresses the impacts to onsite and offsite properties so as not to increase flooding potential of the Salinas River.

We look forward to working with the City of Greenfield to resolve the issues regarding SOI boundary. If you have any questions, feel free to call me at (831) 755-5183.

Sincerely,

Bob Schubert, AICP
Acting Planning and Building Services Manager

cc: Thom McCue, LAFCO Monterey County
Kate McKenna, LAFCO Monterey County
Wayne Tanda, Monterey County RMA
Nick Chiulos, Monterey County
Mike Novo, Monterey County Planning Department
Jeff Main, Monterey County Planning Department
Mark McClain, City of Greenfield
April Wooden, City of Greenfield
Bob Roach, Monterey County Agricultural Commission's Office
Ron Lundquest, Monterey County Public Works
Len Foster, Monterey County Health Department
Lynn Burgess, Monterey County Parks Department
Curtis Weeks, Monterey County Water Resources Management Agency
Tad Stern, PMC
Michael McCormick, PMC

doc: RMA-Greenfield.11.30.06

**MONTEREY BAY**

Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER
Douglas Quetin

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Santa Cruz
County

Jerry Smith
Monterey County

December 7, 2006

Ms. Kate McKenna, Executive Officer
LAFCO of Monterey County
P. O. Box 1369
Salinas, CA 93902

Sent by Facsimile to:
(831) 754-5831.
Original Sent by
First Class Mail.


SUBJECT: SECOND COMMENT LETTER:
PROPOSED GREENFIELD SPHERE OF INFLUENCE UPDATE
(LAFCO FILE NO. 06-10)

Dear Ms. McKenna:

The Air District appreciates the City's stated interest in reviewing site plans when they are submitted, to ensure that residential uses are located a sufficient distance from roadways to protect public health.

Thank you for the opportunity to review the document.

Yours truly,


Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

cc: April Wooden, Director of Community Development
Mark, McClain, Planning Manager
City of Greenfield

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY



PLANNING DEPARTMENT, Mike Novo, Interim Director

168 W. Alisal St., 2nd Floor
Salinas, CA 93901

(831) 755-5025
FAX (831) 757-9516

October 27, 2006

Kate Mckenna, Executive Director
Monterey County Local Agency Formation Commission
P.O. Box 1369
Salinas, CA 93901

SUBJECT: Proposal from the City of Greenfield (LAFCO File 06-10)

Dear Ms. Mckenna:

The Monterey County Resource Management Agency (RMA) has compiled updated comments from the County's land use agencies regarding the proposal from the City of Greenfield to expand their Sphere of Influence. Below are comments from the Agricultural Commissioner, Planning Department, Public Works Department, Health Department, Parks Department and Office of Emergency Services regarding LAFCO File 06-10.

General Comments

In general, there is concern that the SOI is concentric in nature, spreading all sides of the City and north/south along the Highway 101 corridor. As the City is surrounded by prime agricultural land, the SOI takes this valuable land out of production. LAFCO is urged to look at a more directional growth pattern for the City and one that protects agricultural land and prevents growth from spreading along the Highway 101 corridor.

Agricultural Commissioner

The Agricultural Commissioner noted that the City has proposed policies for a 200' buffer in residential areas that adjoin agricultural operations. The City has also proposed to use industrial and ag/visitor serving areas as buffers or transitions to agriculture.

Planning Department

- Any new development adjacent to agricultural areas should include well-defined buffer zones as set forth in Section 21.66.030.F.2 of the County Zoning Ordinance (Title 21). The areas to be utilized as buffer zones shall be placed in easements required as conditions of project approval. For development adjacent to "F", "PG" or "RG" zoning districts, the easement shall be a width of 200 feet or wider where necessary to mitigate adverse impacts between agricultural and adjacent land uses.

- There needs to be a quantifying of the financial loss to the County/region from the conversion of agricultural to the proposed uses, including a discussion of how the agricultural jobs that will be replaced will compare to those created.
- Most of the amended SOI contains approximately 1,300 acres of prime agricultural land. What are the alternatives to converting this amount of prime agricultural land or alternatively how the City will provide for permanent protection of prime ag land elsewhere in the County prior to proceeding with the proposed development?

Public Works Department

- Because of the extent of the potential development in these areas, the County is concerned about the impacts this proposal will have on our existing facilities and resources. The County understands that developments in these areas would likely utilize both County and City public service resources and facilities. The County recommends the City coordinate with the appropriate agencies and County departments when planning and designing public service facilities to ensure acceptable service is provided to the community.
- Because existing County street facilities are potential direct access routes to the proposed SOI areas, the County is very interested in the development within the proposed SOI. As development occurs, County roadways, including, but not limited to, Thorne Road, Walnut Avenue, Elm Avenue and Espinosa Road will be directly impacted by traffic generated by the new growth areas. Impacts to the City and County roadway systems must be determined, and any mitigations identified within the unincorporated portions of the County need to be developed in consultation with the County as well as TAMC and Caltrans. As responsible agencies, each needs to have the opportunities to consult on the scope of the mitigations proposed for the County or State roadway systems.
- The County is very interested in the phasing of the development within the proposed SOI. As development progresses, our agencies must coordinate and implement projects, roadway improvements and mitigations as the region develops to ensure facilities will be sufficient to accommodate the additional demands associated with the growth of the community. The County is available to provide input during the review process of development proposals and roadway facility improvement projects in these areas, and requests the City coordinate with the County of Monterey and all other affected agencies to implement improvements that would affect roadways and facilities in the neighboring County vicinities.
- The Preliminary Sphere of Influence Evaluation for the City of Greenfield prepared in late-2005 states that the existing roadway network will not support the range and intensity of the proposed land uses in the preliminary SOI, and an expanded roadway network would be necessary as portions of that SOI are developed. The County is concerned that these SOI proposals would have similar effects to County roadway facilities. The County requests the City work with the County in identifying and developing improvements that address impacts to the neighboring County roadways facilities.

- As development occurs within the proposed SOI, County roadways will be directly impacted by traffic generated from the new growth areas. Impacts to the City and County roadway systems have been identified in the traffic study for the Draft EIR (DEIR) for the City of Greenfield "South End SOI and GPA Project" – Proposed Land Annexation to the City of Greenfield, and implementation of mitigations identified within the unincorporated portions of the County need to be coordinated with the County, and Caltrans, if State facilities are affected. As responsible agencies, each needs to have the opportunities to consult on the scope of the mitigations proposed for the County or State roadway systems.
- The DEIR identifies a proposed extension of 3rd Street from Elm Avenue to Espinosa Road, presently a county road. This proposed road extension would provide direct access to the project site. New roadways in this vicinity will affect traffic circulation in the area, and including these roadways will help identify potential impacts which will require mitigation. The County supports the DEIR traffic study's recommendation of incorporating this roadway extension in the road network planning in this area.
- The DEIR and traffic study identify direct project impacts at the intersection of the US 101 northbound on/off-ramp / Espinosa Road overpass / Patricia Lane, and proposes the signalization of the intersection to mitigate those impacts. Because this intersection includes Caltrans and County roadway facilities, implementation of this mitigation must be coordinated with Caltrans and Monterey County.
- The DEIR identifies impacts at on/off ramps along US 101 at Espinosa Road. As mitigation for these project impacts, the DEIR identifies a new highway interchange at US 101/Espinosa Road, to be funded through the City's traffic impact fee. Improvements affecting state highway facilities must be coordinated with Caltrans, and a Project Study Report would likely be required. The DEIR and traffic study indicate that this interchange project would also require relocating highway on/off-ramps to existing County roadways, and realigning nearby County roads. All improvement projects affecting County facilities must be coordinated with Monterey County.
- The proposed SOI includes the previously proposed Southern Addition at the southeast City limits. Because the proposed land use includes Commercial Industrial uses, there is the potential for increased vehicle and truck traffic to and from this area. Several County roadways in this vicinity, including Espinosa Road, provide direct access to this area, and any impacts to County roadways must be considered and addressed. A thorough pavement condition analysis shall be conducted and corresponding mitigation measures developed, should the project generate a significant amount of heavy truck traffic on County roads, i.e. increases in the Traffic Index (TI).
- County records identify an adopted plan line for 12th Street from Elm Avenue to Cypress Avenue, along a portion of the westerly boundary of the proposed SOI (Official Plan Line maps, Vol. 2 OPL Pg. 54, Sheet 3). Because the plan line lies along the SOI boundary, if this roadway is annexed into the City, this plan line must also be taken into consideration. If

- the plan line is not consistent with the City of Greenfield's General Plan and needs to be amended or removed (this takes Board Action per Ordinance No. 499), the project applicant must request to have this plan line removed or revised, and the ordinance has to be amended prior to any project approvals.
- Any mitigation measures proposed by the project should conform with regional planning documents, such as the Monterey County General Plan and TAMC's Regional Transportation Plan.
- To address cumulative regional transportation impacts of development within the proposed SOI project, the City is encouraged to utilize the Transportation Agency for Monterey County (TAMC) Regional Impact Fee to generate funds which may be applied towards regional transportation projects. Monterey County supports the City of Greenfield's recent action of adopting a notice of intent to establish a regional development impact fee in the City of Greenfield.
- In the areas of the proposed project/SOI, there are no CSAs (County Service Areas) that would be affected or impacted by this proposal.

Health Department

- The City has been updating its Capital Improvement Plans for water and sewer service on a parallel track with the General Plan. Phased expansion of these systems is currently permitted and underway, and the City has updated its impact fees to address the cost of these systems over time. Further, the General Plan states it is the responsibility of new development to provide infrastructure directly or pay appropriate fees for those services be provided.
- The existing monthly average and peak treatment volume of the wastewater system is 0.87 MGD and 1.42 MGD, respectively. The City of Greenfield has been approved for a waste discharge permit to increase treatment capacity of its current maximum average monthly treatment volume from 1.0 MGD to 2.0 MGD. Phase one of this construction is underway. In order to provide adequate domestic water supply a new well must be constructed to augment the existing supply wells.
- The MCHD supports a planning process that will enable permitted capacity for development as it is constructed. Expansion of the water and wastewater facilities should be permitted, and secured by development impact fees and other adopted fee programs as early in the review process as possible. It is recommended that the expansion of the water and wastewater facilities be constructed prior to the issuance of building permits for any project.

Kate Mckenna
October 27, 2006
Page 5

Parks Department

The Parks Department noted that, pursuant to the Quimby Act, a sufficient amount of parkland is planned for the residential build-out of the proposed SOI.

Office of Emergency Services

The Office of Emergency Services stated they did not have any objection to the proposal as presented.

If you have any questions or need additional information, please feel free to contact me at (831) 755-5183 or schubertbj@co.monterey.ca.us.

Sincerely,



Bob Schubert, AICP
Acting Building and Planning Services Manager

Cc: Thom McCue
Wayne Tanda
Mike Novo
Nick Chiulos
April Wooden
Tad Stern
Bob Roach
Ron Lundquest
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LAFCO
SEP 20 2006

September 15, 2006

File No. 02035.000

Via Facsimile and U.S. Mail

Kate McKenna
Executive Director
Local Agency Formation
Commission of Monterey County
P.O. Box 1369
Salinas, CA 93902

RE: City of Greenfield Application Amendment to Sphere of Influence

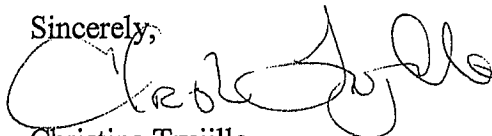
Dear Ms. McKenna:

We have reviewed the City of Greenfield's application to the Local Agency Formation Commission proposing to amend the city's Sphere of Influence and hereby submit the following comments:

- The Department of Conservation should be notified regarding the proceedings before LAFCO since they are interested parties in the "South End" Sphere of Influence project as it relates to the Williamson Act Exchange program.
- The correct acreage designated as highway commercial and heavy industrial should be confirmed because it appears low.

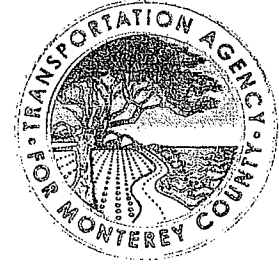
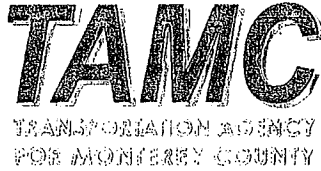
Thank you for your assistance in this matter.

Sincerely,



Christina Trujillo

LAFCO
SEP 20 2006



Regional Transportation Planning Agency • Congestion Management Planning
Local Transportation Commission • Monterey County Service Authority for Freeways & Expressways

September 14, 2006

Ms. Kate McKenna
Executive Director
Local Agency Formation Commission (LAFCO)
P.O. Box 1369
Salinas, California 93902

**SUBJECT: Recommendation for the City of Greenfield Sphere of Influence
Amendment**

Dear Ms. McKenna:

The Transportation Agency for Monterey County is the Regional Transportation Planning Agency and Congestion Management Agency for Monterey County. Transportation Agency staff has reviewed the proposal from the City of Greenfield to expand their municipal sphere of influence by approximately 1,400 acres. Transportation Agency staff offers the following comments for your consideration:

The Environmental Impact Report for the City of Greenfield Southend Sphere of Influence states that the project will accommodate development of 293 new low-density residential units and approximately 217,800 square feet of commercial space on 214 acres, generating approximately 15,600 daily trips. The document acknowledges that 40% of these project trips will travel northbound on US 101, resulting in 6,200 new trips on US 101 north of Greenfield. To mitigate for these cumulative impacts to the regional transportation system, the Transportation Agency has requested that the City of Greenfield collect our agency's Regional Development Impact Fee as described in our *Nexus Study*.

Currently, the regional development impact fee is being updated to explore the implementation of zones for fee calculation based on geographic sub-regions, to utilize the most recent General Plan updates and land use assumptions, and to reevaluate the commercial trip generation rates. Taking these program refinements into consideration, the City of Greenfield Council at its August meeting adopted a Notice of Intent to adopt a regional development impact fee and to condition all new development projects with

payment of the regional fee on a project-by-project basis. Under this program, regional impact fees would be discounted for any overlap with the City of Greenfield's comprehensive local impact fee program, which covers all interchanges with both short and long-term improvements. Combined with the regional impact fee program, the City of Greenfield local fee should be considered a model for other jurisdictions to consider when implementing their own local fee programs.

Our Agency's understanding is that the City of Greenfield will require any new developments in this new sphere of influence to pay a regional development impact fee to mitigate their impacts on the regional transportation system. Based on this commitment by the City of Greenfield, the Transportation Agency recommends that the Local Agency Formation Commission approve the City of Greenfield Southend Sphere of Influence amendment.

Thank you for the opportunity to review this document. If you have any questions, please contact Michael Zeller of my staff at (831) 775-0903.

Sincerely,



Debra L. Hale
Executive Director

CC: Anna Vega, City of Greenfield
Dave Murray, California Department of Transportation (Caltrans) District 5



MONTEREY BAY

Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

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LAFCO

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September 12, 2006

Ms. Kate McKenna, Executive Officer
LAFCO of Monterey County
P. O. Box 1369
Salinas, CA 93902

Sent by Facsimile to:
(831) 754-5831.
Original Sent by
First Class Mail.

SUBJECT: PROPOSED GREENFIELD SPHERE OF INFLUENCE UPDATE
(LAFCO FILE NO. 06-10)

Dear Ms. McKenna:

Staff has reviewed the proposal from the City of Greenfield to expand its municipal sphere of influence by approximately 1400 acres. In June, the District submitted comments on the Draft EIR for the South End General Plan Amendment / Sphere of Influence Amendment, but has not received any response from the City to the comments. Without it, the District cannot make further comments at this time. For your reference, I have attached the comments submitted by the District in June.

Thank you for the opportunity to review the document.

Yours truly,

Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

Attachment



MONTEREY BAY

Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER
Douglas Quetin

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

June 2, 2006

Mr. Mark McClain, Planning Manager/Building Official
City of Greenfield
45 El Camino Real
Greenfield, CA 93927

Sent by Facsimile to:
(831) 674-3149

SUBJECT: DEIR FOR SOUTH END GPA / SOI AMENDMENT

Dear Mr. McClain:

Staff has reviewed the Draft EIR and submits the following comments for your consideration:

NCCAB Attainment Status Designations. Page 3.3-8.

The federal one-hour ozone standard was revoked on June 15, 2005; there is no attainment designation for this revoked standard.

Mitigation Measure MM 3.3-1. Page 3.3-11-13.

The District welcomes the opportunity to review the construction emissions reduction plan (CERP) that would include best-available control measures for site preparation and construction activities. However, without implementation and enforcement of measures to reduce impacts within District thresholds of significance, MM 3.3-1 may not reduce impacts to a less than significant level.

Sub-Measures "n", "o", "p" and "q". Page 3.3-13.

"To the extent feasible"; and "minimize the use", "limit the pieces" and limit hours" (without specified detail) are not enforceable mitigation measures.

Stationary Construction Equipment. Page 3.3-13.

Sub-measure "s", stationary equipment, may include portable equipment that is registered by the State under the Air Resources Board's Portable Equipment Registration Program. Please contact Lance Ericksen, Manager of the District's Engineering Division, for details of this program, as well as stationary sources subject to District permit.

Operational Emissions at Buildout without Mitigation. Page 3.3-15.

The document specifies that the modeling conducted did not take into account onsite mobile emissions associated with distribution facilities, packaging facilities and truck stops. Inasmuch as the Land Use Summary in Table 2-2 on page 2-17 includes 61 acres of highway commercial, 25 acres for a truck stop, and 83 acres of heavy industrial; the District suggests that the modeling be redone to reflect what is outlined in the Project Description.

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MM 3.3-3. Page 3.3-16.

As stated under MM 3.1, above, the District welcomes the opportunity to recommend mitigation measures and suggests the following:

Highway Commercial and Industrial Uses

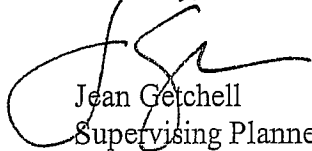
For the truck stop that is proposed on the Franscioni parcel, the District suggests that truck stop electrification be considered. Electrification would not only reduce fuel consumption and costs for the trucker, but would also significantly decrease emissions of diesel particulate matter and toxic air contaminants. This measure should significantly decrease PM₁₀, NO_x and ROG emissions. The District suggests that the benefits of such a measure be quantified. Information from the U. S. Department of Energy is attached for your reference, which includes locations of similar projects in California.

Health Risk Assessment

The District suggests that a Health Risk Assessment be considered for development within 500 feet of Highway 101, especially the proposed residential development.

Thank you for the opportunity to review and comment on this project.

Sincerely,



Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

Attachment

cc: Lance Ericksen, Engineering Division



ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

October 12, 2006

LAFCO
OCT 17 2006

Mr. Thom McCue
LAFCO
P.O. Box 1369
Salinas, CA 93902

**Re: MCH# 20060901 – Notice of Preparation
City of Greenfield Sphere of Influence Update**

Dear Mr. McCue:

AMBAG's Regional Clearinghouse circulated a summary of notice of your environmental document to our member agencies and interested parties for review and comment.

The AMBAG Board of Directors considered the project on October 11, 2006 and has no comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicolas Papadakis", is written over a horizontal line. The signature is fluid and stylized, with a long, sweeping underline that extends to the right.

Nicolas Papadakis
Executive Director

MONTEREY COUNTY



DEPARTMENT OF HEALTH LEN FOSTER, Director

ADMINISTRATION
ANIMAL SERVICES
BEHAVIORAL HEALTH

CLINIC SERVICES
COMMUNITY HEALTH
EMERGENCY MEDICAL SERVICES

ENVIRONMENTAL HEALTH
OFFICE OF THE HEALTH OFFICER
PUBLIC ADMINISTRATOR/PUBLIC GUARDIAN

LAFCO

SEP 11 2006

September 8, 2006

Kate McKenna, Executive Officer
Local Agency Formation Commission
P.O. Box 1369
Salinas, CA 93902

Subject: Proposal from the City of Greenfield to expand the municipal sphere of influence by approximately 1400 acres (LAFCO File 06-10)

The Monterey County Health Department has reviewed the referenced proposal. This proposal would increase the City of Greenfield's municipal sphere of influence by 1400 acres.

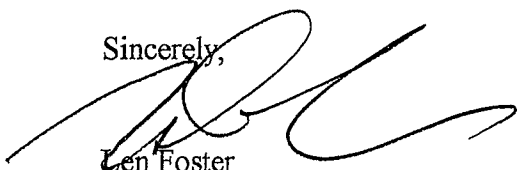
As stated in the application materials, the City has been updating its Capital Improvement Plans for water and sewer service on a parallel track with the General Plan. Phased expansion of these systems is currently permitted and underway, and the City has updated its impact fees to address the cost of these systems over time. Further the General Plan states it is the responsibility of new development to provide infrastructure directly or pay appropriate fees for those services be provided.

The existing monthly average and peak treatment volume of the wastewater system is 0.87 MGD and 1.42MGD respectively. The City of Greenfield has been approved for a waste discharge permit to increase treatment capacity of its current maximum average monthly treatment volume from 1.0 MGD to 2.0 MGD. Phase one of this construction is underway. In order to provide adequate domestic water supply a new well must be constructed to augment the existing supply wells.

The MCHD supports a planning process that will enable permitted capacity for development as it is constructed. Expansion of the water and wastewater facilities should be permitted, and secured by development impact fees and other adopted fee programs as early in the review process as possible. It is recommended that the expansion of the water and wastewater facilities be constructed prior to the issuance of building permits for any project.

Thank you for the opportunity to comment on this municipal sphere of influence expansion for the City of Greenfield.

Sincerely,


Len Foster
Director of Health

cc: Mary Anne Dennis, Environmental Health Review, Supervisor

LAFCO
SEP 20 2006

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY



PLANNING DEPARTMENT, Mike Novo, Interim Director

168 W. Alisal St., 2nd Floor
Salinas, CA 93901

(831) 755-5025
FAX (831) 757-9516

September 18, 2006

Kate Mckenna, Executive Director
Monterey County Local Agency Formation Commission
P.O. Box 1369
Salinas, CA 93901

SUBJECT: Proposal from the City of Greenfield (LAFCO File 06-10)

Dear Ms. Mckenna:

The Monterey County Resource Management Agency (RMA) has reviewed the proposal from the City of Greenfield to expand their Sphere of Influence by approximately 1400 acres. Below are comments from the Planning Department and the Public Works Department regarding LAFCO File 06-10.

Planning Department

Any new development adjacent to agricultural areas should include well-defined buffer zones as set forth in Section 21.66.030.F.2 of the County Zoning Ordinance (Title 21). The areas to be utilized as buffer zones shall be placed in easements required as conditions of project approval. For development adjacent to "F", PG" or "RG" zoning districts, the easement shall be a width of 200 feet or wider where necessary to mitigate adverse impacts between agricultural and adjacent land uses.

Public Works Department

- County records identify an adopted plan line for 12th Street from Elm Avenue to Cypress Avenue, along a portion of the westerly boundary of the proposed SOI (see attached Official Plan Line maps, Sheet 3). Because the plan line lies along the SOI boundary, if this roadway is annexed into the City, this plan line must also be taken into consideration. If the plan line is not consistent with the City of Greenfield's General Plan and needs to be amended or removed (this takes Board Action per Ordinance No. 499), the project applicant must request to have this plan line removed or revised, and the ordinance has to be amended prior to any project approvals.
- As development occurs within the proposed SOI, County roadways will be directly impacted by traffic generated by the new growth areas. Impacts to the City and County roadway systems shall be identified in the appropriate traffic studies, and any implementations of mitigations identified within the unincorporated portions of the County need to be coordinated with the County as well as TAMC and Caltrans. As responsible agencies, each needs to have the opportunities to consult on the scope of the mitigations proposed for the County or State roadway systems.

Ms. Kate McKenna

Page 2

- Any mitigation measures proposed by the project should conform with regional planning documents, such as the Monterey County General Plan and TAMC's Regional Transportation Plan.
- To address cumulative regional impacts of development within the proposed SOI project, the City is encouraged to utilize the Transportation Agency for Monterey County (TAMC) Regional Impact Fee to generate funds which may be applied towards regional transportation projects. Monterey County supports the City of Greenfield's recent action of adopting a notice of intent to establish a regional development impact fee in the City of Greenfield.
- The proposed SOI includes the previously proposed Southern Addition at the southeast City limits. Because the proposed land use includes Commercial Industrial uses, there is the potential for increased vehicle and truck traffic to and from this area. Several County roadways in this vicinity, including Espinosa Road, provide direct access to this area, and any impacts to County roadways must be considered and addressed. A thorough pavement condition analysis shall be conducted and corresponding mitigation measures developed, should the project generate a significant amount of heavy truck traffic on County roads, i.e. increases in the Traffic Index (TI).
- Because there are no CSAs (County Service Areas) that would be affected or impacted by this proposal, Public Works/Environmental Services (Special Districts) has no comments.
- Public Works has prepared comments for previous SOI proposals from the City of Greenfield over the past several months. Because many of the issues identified in those SOI applications are very similar, our previous comments are still applicable.

If you have any questions or need additional information, please feel free to contact me at (831) 755-5183 or schubertbj@co.monterey.ca.us.

Sincerely,



Bob Schubert, AICP

Acting Building and Planning Services Manager

Attachment

Cc: Mike Novo

Nick Chulos

**OFFICIAL PLAN LINES
OF
12TH ST. GREENFIELD**
WHICH IS A PART OF STREETS AND HIGHWAYS
PLAN OF THE MASTER PLAN OF THE
COUNTY OF MONTEREY, STATE OF CALIFORNIA
THIS MAP CONSTITUTES SECTION ~~XXV~~ OF ORDINANCE NO. 499

I hereby certify that this map was adopted by
the Board of Supervisors of the County of Monterey,
State of California by an ordinance of said Board
on the 18th day of March, 1969.

EMMET G. McMENAMIN
County Clerk and Ex-Officio Clerk of the Board
of Supervisors of the County of Monterey,
State of California.
By: Lester H. Seiring, Deputy

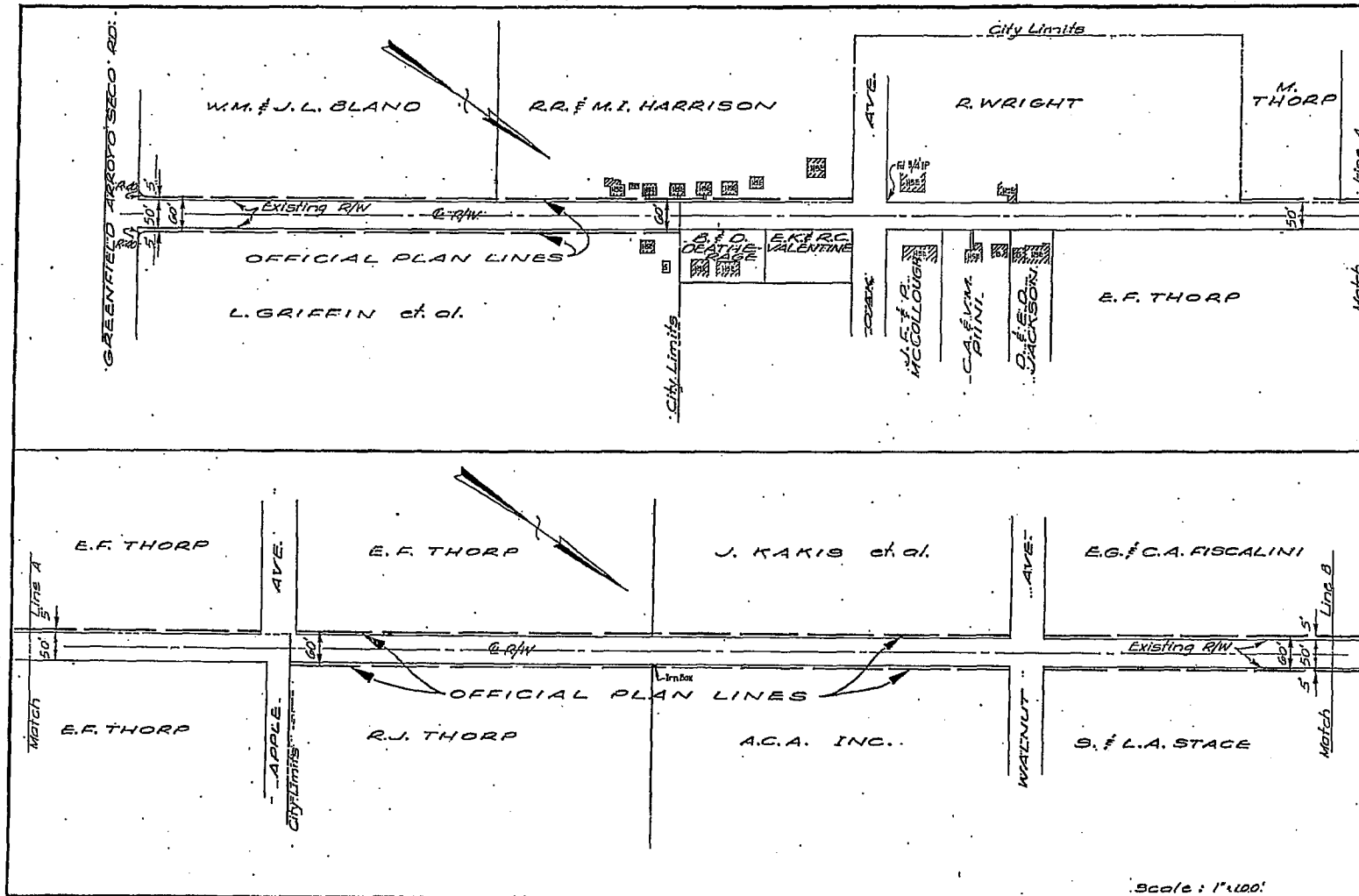
We hereby certify that the Official Plan
Lines of 12th St. Greenfield, according
to the Streets and Highways Plan, being
a part of the Master Plan of the County
of Monterey, State of California, as the
same are set forth on this map were
approved by the County Planning Commission
of said County by a resolution adopted
on the 18th day of Feb. 1969.

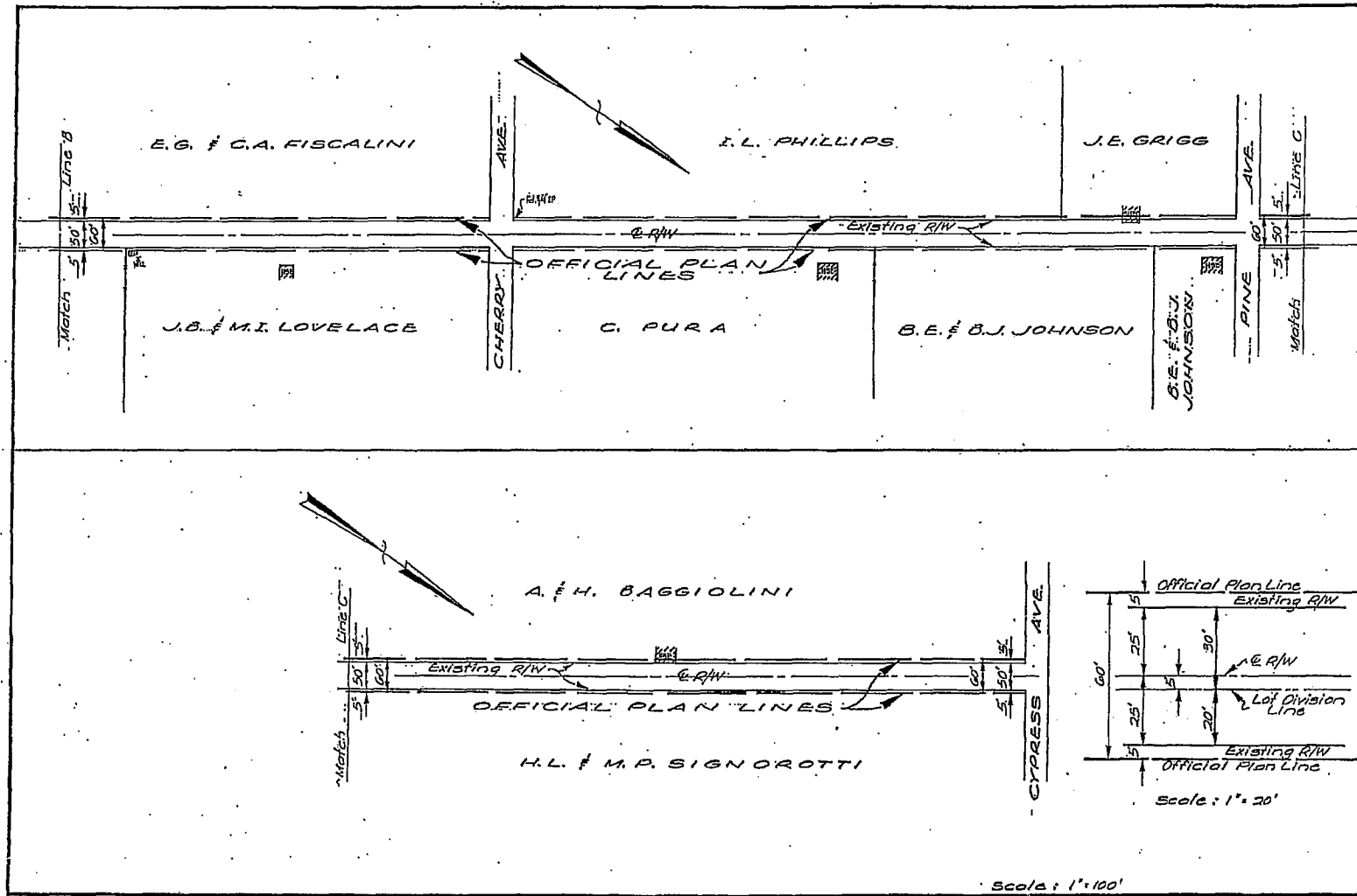
Edith Mera
Secretary of the County Planning Commission
of the County of Monterey, State of California
Edith Mera
Vice-Chairman of the County Planning Commission
of the County of Monterey, State of California

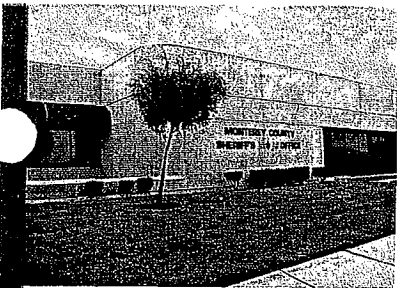
G 07241

Filed for record at the request of
Bruce W. McClain, County Surveyor,
this 22nd day of March, 1969, at 11
minutes past 2am in Volume 21
of Official Plan Lines of page 54
Records of Monterey County, State
of California.

EMMET G. McMENAMIN
Recorder
by Therese J. Wood
Deputy







OFFICE OF THE SHERIFF MONTEREY COUNTY, CALIFORNIA

LAFCO

SEP 07 2006

Central Station
1414 Natividad Road Rm. 103
Salinas, CA 93906

September 5, 2006

LAFCO of Monterey County
Kate McKenna, Executive Officer
P.O. Box 1369
Salinas, CA 93902

Kate McKenna,

This office has thoroughly reviewed LAFCO File 06-10, the City of Greenfield proposal for expansion. Thank you for the opportunity to provide departmental input. The Sheriff's Office has no issues or comments regarding the approval of this proposal.

Sincerely,

David Crozier
Crime Prevention Specialist

MST

MONTEREY-SALINAS TRANSIT

LAFCO
SEP 11 2006

JOINT POWERS AGENCY MEMBERS:

*City of Carmel-by-the-Sea • City of Del Rey Oaks • City of Marina • City of Monterey • City of Pacific Grove
City of Salinas • City of Seaside • County of Monterey • City of Gonzales (ex. officio)*

September 6, 2006

Kate McKenna
Executive Officer
Monterey County Local Agency Formation Commission
P.O. Box 1369
Salinas, CA 93901

**RE: City of Greenfield Sphere of Influence
Update**

Dear Ms. McKenna:

Thank you for the opportunity to comment on the City of Greenfield's proposal to expand their municipal sphere of influence by approximately 1400 acres (LAFCO File 06-10). MST commends the City of Greenfield for a comprehensive Circulation Element of their General Plan.

In accordance with the City's General Plan, MST would like to take this opportunity to note that it will be difficult to achieve efficient and affordable operation of public transit vehicles in an area that is planned to be primarily low density residential. Section 2 of the Update states that there will be zero High Density Residential, zero Downtown Commercial (Mixed Use, Mixed Use Gateway), and zero Highway Commercial (Mixed Use, Mixed Use Gateway) planned for the Future Growth Area. This type of land use zoning is not conducive to smart transit planning simply because the cost of public transit service increases with the distance required to serve patrons.

MST is concerned that this cost will be an additional burden to the City of Greenfield, residents and visitors. MST strongly encourages the City of Greenfield to re-consider incorporating land uses that will reduce the cost of transit service for families with children, disabled individuals, and older adults who are dependent on public transit services. For your convenience, I am including an excerpt from Section IV of the General Plan, which elaborates on General Plan Goal 3.4. Please make note of the policies.

Goal 3.4 Work with transportation agencies to provide adequate, convenient, and affordable public transportation.

Policy 3.4.2

Encourage transit providers to improve transit routes, frequency, and level of service to serve the mobility needs of Greenfield residents.

Policy 3.4.3

Support County programs that provide transportation services to the elderly and handicapped.

Policy 3.4.4

Support the use of transit facilities by promoting public transit, ride sharing, and Dial-a-Ride systems.

Program 3.4.B

Prepare and adopt development standards that require convenient access to public transit including but not limited to public transit vehicle stops and associated turning maneuvers.

Program 3.4.C

Develop a strategic approach to pursue funding opportunities for public transit service within Greenfield and linking with the surrounding region, while working closely with other agencies and neighboring jurisdictions.

Program 3.4.D

Coordinate with Monterey Salinas Transit to ensure that adequate fixed route transit service is provided within Greenfield, and linking with the surrounding region, including convenient transfers between transit services and other modes of travel.

MST is very willing to assist with the planning of efficient future routes and compatible land uses. We are currently updating our transit planning manual: *Designing for Transit: A Manual for Integrating Public Transportation and Land Use in Monterey County*.

Please let me know if you have any questions or concerns. I can be reached at 393-8128.

Sincerely,



Mary Archer
Planner

C: Fernando Armenta, *Chairman - MST Board of Directors*
Maria Orozco, *City of Gonzales - Ex Officio MST Board Member*
Debbie Hale, *Transportation Authority for Monterey County*
Ron Lundquist, *Monterey County - County Public Works Director*
Dave Murray, *California Department of Transportation (Caltrans) District 5*
Nicolas Papadakis, *Association of Monterey Bay Area Governments (AMBAG)*
Douglas Quetin, *Monterey Bay Unified Air Pollution Control District (MBUAPCD)*

Jones, Rachelle F. 754-5838

From: McKenna, Kate 754-2587
Sent: Thursday, September 14, 2006 10:57 AM
To: Jones, Rachelle F. 754-5838
Subject: FW: Greenfield Sphere of Influence - to file

—Original Message—

From: Brian Rianda [mailto:brianrianda@rianda.com]
Sent: Thursday, September 14, 2006 10:50 AM
To: McKenna, Kate 754-2587
Subject: Greenfield Sphere of Influence

Hi Kate. Following are comments on the above referenced proposal to LAFCO.

I believe that the sphere of influence is about what we feel is appropriate, however, the future planning areas on the South side of town are a concern.

As you know, I am in favor of directing a rather narrow band of development to the foothills. The ground to the east which is the preferable direction takes out some excellent farmland, therefore, I would suggest that the future planning area go to the west, toward the Arroyo Seco, which is very good vineyard land. As you know, the Conservancy would like to see the linear, high density, "smart growth principles" development along the edges of the valley, keeping as much of the valley open for production as possible.

Brian Rianda, Managing Director
Monterey County Agricultural &
Historical Land Conservancy, Inc.
66 Monterey-Salinas Hwy.
Salinas, CA 93908-8976

Ph: 831.422.5868
Fax: 831.758.0460
Cell: 831.229.0984

e-mail: brian@rianda.com
web address: www.aglandconservancy.org

LAFCO

SEP 22 2006

Memorandum

Office of Emergency Services

DATE: August 28, 2006

TO: Kate McKenna, LAFCO Executive Officer

FROM: Paul Ireland, Emergency Services Manager

SUBJECT: Proposal from the City of Greenfield to expand their municipal sphere of influence by approximately 1400 acres (LAFCO File No. 06-10)

The above mentioned proposal has been reviewed by the Monterey County Office of Emergency Services with no comment.

Please call me at 796-1901 if you require any additional assistance.